

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JODY CONCEPCION,

Plaintiff

-against-

**NOTICE OF CROSS MOTION
TO AMEND COMPLAINT**

THE CITY OF NEW YORK, POLICE OFFICER
ALEXIS FERNANDEZ, Shield #29781,
"JANE and JOHN DOES" 1-15,
AND THE REPUBLICAN NATIONAL COMMITTEE,

05-cv-8501
(KMK)(JCF)

Defendants
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PLEASE TAKE NOTICE, that upon the Declaration of Karen Wohlforth, Esq., dated February 7, 2007, and the exhibits annexed thereto, the memorandum of law dated February 7, 2007, and upon all prior pleadings and proceedings herein, plaintiff, JODY CONCEPCION, will move this Court, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, before the Honorable Kenneth M. Karas, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court to amend the Amended Verified Complaint, and in opposition to the motion by Corporation Counsel for defendants to dismiss the conspiracy claim against the defendants City of New York and Republican National Committee.

FILED
MAR 1 2007
CLERK OF COURT
SOUTHERN DISTRICT OF NEW YORK

PLEASE TAKE FURTHER NOTICE that pursuant to the Order of the Honorable Kenneth M. Karas, United States District Judge: reply papers are to be served no later than March 1, 2007.

Dated: New York, New York

February 7, 2007

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By: 

KAREN WOHLFORTH (kd0235)

To: Jeffrey A. Dougherty
Asst. Corporation Counsel
Special Federal Litigation Division